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Attorneys for Defendants
SAN DIEGO COUNTY REGIONAL AIRPORT
AUTHORITY and THELLA BOWENS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JOSE HERNANDEZ,
Plaintiff,
v.

SAN DIEGO COUNTY REGIONAL
AIRPORT AUTHORITY, a public entity;
and DOES 1 through 12, inclusive,

Defendants.

CASE NO. 08 CV 0184 L CAB

**JOINT MOTION AND STIPULATION TO
HOLD IN ABEYANCE DEFENDANT SAN
DIEGO COUNTY REGIONAL AIRPORT
AUTHORITY'S MOTION FOR JUDGMENT
ON THE PLEADINGS AND DEFENDANT
THELLA BOWENS' MOTION TO DISMISS**

Date: May 19, 2008
Time: 10:30 a.m.
Judge: Hon. James Lorenz
Crtrm. 14

WHEREAS, the parties have entered into an oral agreement to resolve this matter and the parties are currently negotiating the terms of a mutually satisfactory written settlement agreement;

WHEREAS, if the parties are able to resolve this matter, the May 19, 2008 hearings on the defendant San Diego County Regional Airport Authority's motion for judgment on the pleadings and defendant Thella Bowens' motion to dismiss will not be necessary; and

WHEREAS, the settlement agreement will likely not be finalized prior to the May 19,

1 2008 hearing date.

2 THEREFORE, the parties by and through their respective counsel, Sandra L. McDonough
3 of Paul, Plevin, Sullivan & Connaughton, LLP on behalf of defendants and Cathryn Chinn on
4 behalf of plaintiff Jose Hernandez, hereby stipulate to hold the hearing on the motion for
5 judgment on the pleadings and motion to dismiss in abeyance for thirty days, or for a longer
6 period more convenient for the court, in order to allow the parties sufficient time to enter into a
7 mutually satisfactory written settlement agreement and present the court with a stipulation for
8 dismissal of this action with prejudice. In the event the parties are unable to enter into a mutually
9 satisfactory written settlement agreement, the hearing on the above-referenced motions will take
10 place on a date convenient for the court, as set forth in the concurrently filed proposed order.

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12 SO STIPULATED AND AGREED:

13 Dated: May 14, 2008

PAUL, PLEVIN, SULLIVAN &
CONNAUGHTON LLP

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15 By: /s/ Sandra L. McDonough
16 FRED M. PLEVIN
17 SANDRA L. MCDONOUGH
18 ALBERT R. LIMBERG
19 Attorneys for Defendants
20 SAN DIEGO COUNTY REGIONAL
AIRPORT AUTHORITY and THELLA
BOWENS

21 Dated: May 14, 2008

LAW OFFICES OF CATHRYN CHINN

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23 By: /s/ Cathryn Chinn
24 CATHRYN CHINN
25 Attorneys for Plaintiff
26 JOSE HERNANDEZ
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